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December 31, 2022

**VIA ECF:**

The Honorable Ann M. Donnelly  
United States District Court Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Kelly*, 19 CR 286 (AMD)

Dear Judge Donnelly:

I write respectfully to request a final two-week extension, until February 17, 2022, in which to file Mr. Kelly's post-trial motions. The government does not object to this request. Although undersigned counsel has been working diligently to complete Mr. Kelly's post-trial motions, several issues have arisen that demand a short extension. First, the MDC indefinitely suspended all jail visits nearly a month ago, preventing undersigned counsel from meeting with Mr. Kelly to review the proposed pleadings. To complicate matters, Mr. Kelly was advised that he contracted COVID which interfered with his ability to speak with counsel by telephone.<sup>1</sup> Undersigned counsel has arranged several zoom meetings with Mr. Kelly over the next two weeks, but the first meeting could not be confirmed until February 3, 2022. It is vitally important that Mr. Kelly meaningfully participate in his post-trial defense. The MDC has not indicated when visits will resume which is less than ideal, but undersigned counsel is confident that she can accomplish necessary discussions with Mr. Kelly via upcoming scheduled zoom visits.

Second, Mr. Kelly made the important decision of parting ways with his trial team. This decision required serious consideration, and of course, demanded that Mr. Kelly confer with the members of his trial team. Mr. Cannick and Mr. Scholar have already moved to withdraw from the case. Counsels Blank-Becker and Farinella have asked that undersigned counsel sign a substitution of counsel which they intend to file with this Court in short course. Undersigned counsel prefers to file post-trial motions once all counsel has formally withdrawn. As such, Mr. Kelly respectfully seeks a final extension until February 17, 2022 for the filing of his motions.

Respectfully Submitted,

/s/JENNIFER BONJEAN

cc: AUSA Elizabeth Geddes (via ECF)  
AUSA Maria Melendez Cruz (via ECF)  
AUSA Nadia Shihata (via ECF)

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<sup>1</sup> Mr. Kelly's COVID status has already been publicly disclosed.